# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIMINAL NO. 22-342 (SCC)(HRV)

JULIO M. HERRERA-VELUTINI,

Defendant.

## **DEFENDANT'S MOTION TO RESTRICT**

#### TO THE HONORABLE COURT:

COMES NOW the defendant, Julio M. Herrera-Velutini ("Mr. Herrera") through his undersigned attorneys, who respectfully states and prays as follows:

- 1. Today, Mr. Herrera will file a Motion in Reply and respectfully requests that the motion be accepted by the Court for filing with the following level of restriction: *Restricted viewing for case participants only (The Government and the Defendants)*.
- 2. Mr. Herrera's reply is in response to the Government's 404(b) Notice (Dkt. 639), which was filed under a restricted level. Mr. Herrera is filing restricted to maintain consistency in the level of protection.

**WHEREFORE**, Mr. Herrera respectfully requests that the motion remain sealed under the requested restriction level.

### **DLA Piper (Puerto Rico) LLC**

#### /s/ Sonia I. Torres-Pabón

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# **CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that on this same date we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

In San Juan, Puerto Rico, this 30th day of October, 2024.

/s/ Sonia I. Torres-Pabón

Sonia I. Torres-Pabón